

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
MARGARET W. LAMBROSE
3 Assistant Federal Public Defender
Nevada State Bar No. 11626
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Maggie_Lambrose@fd.org
7 Attorney for Fredy Hernandez-Gomez

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 FREDY HERNANDEZ-GOMEZ,
15 Defendant.

Case No. 2:18-mj-328-GWF-1

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Fifth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
18 States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Margaret W.
20 Lambrose, Assistant Federal Public Defender, counsel for Fredy Hernandez-Gomez, that the
21 Preliminary Hearing currently scheduled on August 9, 2018 at 4:00 p.m., be vacated and
22 continued to a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Counsel for the defendant needs additional time for a written plea agreement to
25 be signed and a change of plea to be entered.
26 2. Defendant is incarcerated and does not object to a continuance.

1 3. Additionally, denial of this request for continuance could result in a miscarriage
2 of justice.

3 This is the fifth request for continuance filed herein.

4 DATED this 8th day of August, 2018.

5
6 RENE L. VALLADARES
7 Federal Public Defender

 DAYLE ELIESON
 Acting United States Attorney

8 By /s/ Margaret W. Lambrose
9 MARGARET W. LAMBROSE
 Assistant Federal Public Defender

 By /s/ Christopher Burton
 CHRISTOPHER BURTON
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 FREDY HERNANDEZ-GOMEZ,

7 Defendant.
8

Case No. 2:18-mj-328-GWF-1

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 August 9, 2018 at the hour of 4:00 p.m., be vacated and continued to September 11, 2018 at
13 the hour of 4:00 p.m.

14 DATED this 9th day of August, 2018.

15
16 

17 UNITED STATES MAGISTRATE JUDGE
18
19
20
21
22
23
24
25
26